

EXHIBIT A

9. Defendants object to Instruction 1 as overly broad, unduly burdensome, and because it seeks information not relevant to any claim or defense. Unless otherwise stated, Defendants will limit their responses to information available from July 21, 2017 through September 9, 2019.

SPECIFIC OBJECTIONS AND RESPONSES

Interrogatory No. 1: Identify all persons with knowledge or information relating to the allegations in the civil complaint, including any related denials or defenses asserted in any answer to the civil complaint.

Objections and Response to Interrogatory No. 1:

Defendants object to this interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, the attorney work product doctrine, and the deliberative process privilege.

Defendants further object to this interrogatory as overly burdensome and disproportionate to the needs of the case. The complaint in this case consists of 505 paragraphs of allegations, many of which are not pertinent to Plaintiff's claims. To answer this interrogatory would require Defendants to identify persons with knowledge regarding any of those 505 paragraphs. Defendants further object to the extent this interrogatory purports to require Defendants to identify every person with knowledge or information, now matter how minor or immaterial, relating to the allegations in the complaint.

Subject to and without waiving the foregoing objections, the following persons have material knowledge or information relating to the allegations of sexual harassment, discrimination, and/or retaliation in the civil complaint:

- Anthony ("Tony") Martinez
Former Federal Defender

Federal Public Defender, Western District of North Carolina

- John Parke (“JP”) Davis
Assistant Federal Defender
Federal Public Defender, Western District of North Carolina
- Peter Adolf
Assistant Federal Defender
Federal Public Defender, Western District of North Carolina
- Joshua B. Carpenter
Appellate Chief
Federal Public Defender, Western District of North Carolina
- William (“Bill”) Moorman
Administrative Officer
Federal Public Defender, Western District of North Carolina
- Heather Beam
Human Resources Manager
United States District Court & Probation
Western District of North Carolina
- Edward (“Ed”) Smith
Chief Circuit Mediator
U.S. Court of Appeals for the Fourth Circuit
- James Ishida
Circuit Executive
U.S. Court of Appeals for the Fourth Circuit
- The Honorable Roger L. Gregory
Chief Judge
U.S. Court of Appeals for the Fourth Circuit
- Jill Langley
Director of Workplace Relations
U.S. Courts of Appeals for the Eighth and Tenth Circuits
- Nancy Dunham
Former Fair Employment Practices Officer
Administrative Office of the U.S. Courts
- Lee Ann Bennett
Deputy Director
Administrative Office of the U.S. Courts